

HEATHER E. WILLIAMS, #122664
Federal Defender
MEGAN T. HOPKINS, #294141
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, CA 95823
Telephone: 916-498-5700
Fax: 916-498-5710

Attorney for Defendant
JOSE LUIS RAMOS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:21-cr-00225-02 WBS
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE AND
v.)	EXCLUDE TIME
)	
JOSE LUIS RAMOS,)	
)	Date: March 11, 2024
Defendant.)	Time: 9:00 a.m.
)	
)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel, Assistant United States Attorney Cameron Desmond, counsel for plaintiff, and Assistant Federal Defender Megan T. Hopkins, counsel for defendant Jose Luis Ramos, that the status conference scheduled for January 29, 2024, be continued **March 11, 2024, at 9:00 a.m.**

Government counsel has provided the Mr. Ramos with a written plea offer in this case, and counsel for the defendant will need time to translate and review the offer. Additionally, the defense is conducting ongoing investigation and engaging in reciprocal exchange of discovery. The requested continuance will allow for the time necessary for the defense to conduct its investigation and for the defendant to determine how best to proceed in this case in light of the plea offer received.

1 Accordingly, the parties request that the status conference in this matter be reset for
2 March 11, 2024. The parties agree that the ends of justice served by resetting the status
3 conference date outweigh the best interest of the public and the defendant in a speedy trial.
4 Therefore, the parties agree that time is excludable from January 29, 2024, through March 11,
5 2024, pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

6 Dated: January 22, 2024

Respectfully submitted,

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8 HEATHER E. WILLIAMS
Federal Public Defender

9 /s/ Megan T. Hopkins
10 MEGAN T. HOPKINS
Assistant Federal Defender
11 Attorney for Defendant
JOSE LUIS RAMOS

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13 PHILLIP A. TALBERT
United States Attorney


14 Dated: January 22, 2024

15 /s/ Cameron Desmond
16 CAMERON DESMOND
Assistant United States Attorneys
Attorneys for Plaintiff

ORDER

IT IS HEREBY ORDERED that the status conference scheduled for January 29, 2024, at 9:00 a.m. is continued to **March 11, 2024, at 9:00 a.m.** The time period between January 29, 2024 and March 11, 2024 is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Dated: January 23, 2024



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE